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Ms. Katherine Benham
Room 4008-So., Ag Stop 0268
USDA-AMS-TMD-NOP
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**Comments on the Sunset Review of Hydrated Lime Entries
on the National List of Allowed Substances**

The National Lime Association (NLA) appreciates the opportunity to comment to the National Organic Standards Board. NLA is the trade association for manufacturers of high calcium quicklime, dolomitic quicklime, and hydrated lime, collectively referred to as "lime."

NLA opposes the recommendation to remove hydrated lime from the National Organic Program lists of synthetic substances allowed for use in organic crop and livestock production. In these applications, hydrated lime provides essential and unique qualities without adverse effects on the environment or human health.

The importance of continued availability of hydrated lime is clearly set out in the comments submitted by Pennsylvania Certified Organic and by the California Coalition of Organic Farmers. As those and other comments point out, historically, lime has been used in a wide variety of agricultural applications, including soil sweetening, Bordeaux mixtures, treatment of manures and mortalities, and whitewash. Current applications include use in crop disease control formulations and as a topical hoof treatment.

General Comments:

NLA believes that the recommendations of the Crops and Livestock Committees to remove hydrated lime were based on erroneous and exaggerated evaluations of the environmental and health characteristics of hydrated lime. Points raised in the Crops Committee's Recommendations, and in the Evaluation Criteria Document, are addressed below:

Environmental Impact of Manufacture: While energy is used to produce lime, the lime industry is increasingly energy-efficient, and is participating in the Department of Energy's ClimateVISION program, under which it has committed to take specific steps that will further improve efficiency. With respect to dust created when lime is made, lime kiln dust is a valuable product that is recycled or sold by most lime producers.

Environmental Contamination Potential: The principle characteristic of hydrated lime is its alkaline pH. This pH level is generally what makes it an effective agent, and it can create temporary changes in environmental pH. The Environmental Protection Agency has declared that use of hydrated lime in pesticide products "will not adversely affect the environment" under current patterns of use (See <http://www.epa.gov/opprd001/inerts/lists.html>, List 4B).

Hydrated lime products do not contain significant levels of contaminants, because they are manufactured by heating high-quality limestone (calcium carbonate), and then adding water. Under proper and typical use, hydrated lime products used in agriculture will have minimal impacts on the environment.

Human and Animal Health: Because of its alkaline pH, hydrated lime can irritate skin, eyes, and lungs. Ingestion of sufficient hydrated lime to cause serious harm is very unlikely, and is virtually unknown. Proper handling according to package instructions can prevent these hazards, and, as noted above, hydrated lime has been used successfully and safely in agricultural applications for centuries.

Specific Comments on Crops Committee Recommendations:

NLA finds the Crops Committee's recommendation difficult to understand. The concluding paragraph indicates that "hydrated lime should be considered a production aid, insofar as it is vital to the production of two exempted sulfur or copper containing materials in order to make these materials non-phytotoxic to plants." However, the Committee then goes on to recommend not renewing hydrated lime to the National List. This may be because "lime sulfur" and copper-based materials remain on the list. However, the list does not clearly include Bordeaux mixture (which contains both copper sulfate and hydrated lime), and it is not clear what effect removal of hydrated lime from the list would have on these materials. In addition, as noted by the California Coalition of Organic Farmers in its comments, hydrated lime is used alone in a significant subset of organic fruit farming, in many cases without an acceptable alternative.

Specific Comments on Livestock Committee Recommendations:

As Pennsylvania Certified Organic noted in its comments, hydrated lime is an effective topical treatment in certain livestock applications, and the listing should be maintained. NLA is unaware of any current use of hydrated lime as a parasiticide, and believes that no such use is currently registered with the Environmental Protection Agency. Nevertheless, hydrated lime has been used around livestock for centuries for multiple uses, and use of this material should not affect the designation of livestock as organic.

Conclusion:

NLA strongly urges the Board to retain the current listings of hydrated lime on the National List. We would be pleased to provide any additional information you may require.

Very truly yours,

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